

EXHIBIT B

From: Loftus, Julie
Sent: Monday, July 29, 2024 12:45 PM
To: Chris Kachouroff
Cc: Frey, Timothy; Bedell, James
Subject: RE: Activity in Case 0:22-cv-00098-JMB-JFD Smartmatic USA Corp. et al v. Lindell et al Order on Motion for Order to Show Cause

Chris:

It is difficult to tell exactly what you are proposing from this one screenshot. We are looking for the following:

- Tracked pageviews
- Unique pageviews
- Average time on page
- Entrances
- Bounce rate
- Exit percent.

These data points were all represented in FrankSpeech's metrics production, attached as Exhibit A to Defendants' opposition to Smartmatic's motion to show cause. We are looking for the same, but for michaeljlindell.com. We seek these data points between February 1, 2021 and August 31, 2021.



Julie Loftus
(she/her/hers)

Managing Associate | Litigation
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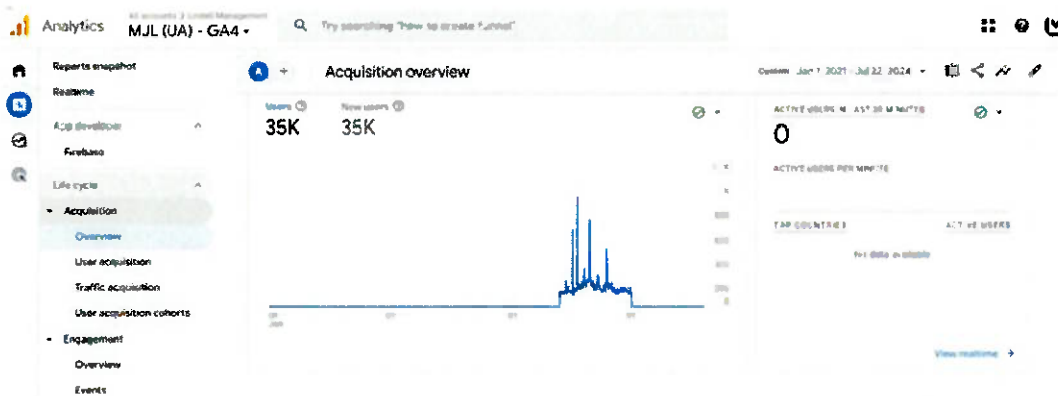
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637

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From: Chris Kachouroff <chris@mck-lawyers.com>
Sent: Tuesday, July 23, 2024 10:28 AM
To: Loftus, Julie <JLoftus@beneschlaw.com>
Cc: Frey, Timothy <TFrey@beneschlaw.com>; Bedell, James <JBedell@beneschlaw.com>
Subject: Re: Activity in Case 0:22-cv-00098-JMB-JFD Smartmatic USA Corp. et al v. Lindell et al Order on Motion for Order to Show Cause

Julie,

Is this what you wanted? If so, I'll PDF it and bate stamp it.



On Mon, Jul 22, 2024 at 10:24 AM Loftus, Julie <JLoftus@beneschlaw.com> wrote:

Chris,

The documents we are seeking are the same documents we identified in our motion to compel briefing, motion to show cause briefing, and at the motion to show cause hearing: analytics data for michaeljlindell.com and documents related to Mr. Lindell's financial data for the years 2022 and 2023.

On the analytics data, you represented at the hearing that the data sought is available through Google Analytics, and anyone can access it. That anyone can access this data was a—we assume inadvertent—misstatement. The account owner is the only person who may access Google Analytics data. Smartmatic has long sought the production of this data, which is responsive to Smartmatic's Interrogatory No. 15.

On the financial data, we discussed at the hearing that tax returns have a base set of documents on which they are prepared—e.g., W2, 1099, K-1. Regardless of whether his accountant has completed his 2022 or 2023 tax returns, Mr. Lindell has those base documents yet still refuses to produce them. Additionally, items Mr. Lindell produced for other years, e.g., bank statements, are responsive to Smartmatic's request. Nothing produced the week following the motion to show cause hearing were documents from 2022 to 2023. Thus, a material deficiency in Defendants' production remains. See ECF No. 286 (Plaintiffs' Notice Regarding Defendants' Compliance).

I'll give you a call to contact Judge Bryan's chambers re: briefing and schedule.

Benesch

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From: Chris Kachouroff <chris@mck-lawyers.com>

Sent: Friday, July 19, 2024 5:25 PM

To: Loftus, Julie <JLoftus@beneschlaw.com>

Cc: Frey, Timothy <TFrey@beneschlaw.com>

Subject: Re: Activity in Case 0:22-cv-00098-JMB-JFD Smartmatic USA Corp. et al v. Lindell et al Order on Motion for Order to Show Cause

I'm available and will be appealing the show cause order. In the meantime what do you contend is missing from our production because I have no idea?

Sent from my iPhone

On Jul 19, 2024, at 1:20 PM, Loftus, Julie <JLoftus@beneschlaw.com> wrote:

Chris:

With the understanding that this issue is now before Judge Bryan, we would like to call Judge Bryan's chambers on Monday morning to inquire about what Judge Bryan will want to see from the parties in terms of briefing and scheduling the hearing. Please advise as to your availability to call Judge Bryan's chambers.

Best,

Julie

Julie Loftus
(she/her/hers)
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From: ecf-notice@mnd.uscourts.gov <ecf-notice@mnd.uscourts.gov>
Sent: Thursday, July 18, 2024 1:41 PM
To: mndecfnotifications@mnd.uscourts.gov
Subject: Activity in Case 0:22-cv-00098-JMB-JFD Smartmatic USA Corp. et al v. Lindell et al Order on Motion for Order to Show Cause

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U.S. District Court

U.S. District of Minnesota

Notice of Electronic Filing

The following transaction was entered on 7/18/2024 at 1:41 PM CDT and filed on 7/18/2024

Case Name: Smartmatic USA Corp. et al v. Lindell et al
Case Number: [0:22-cv-00098-JMB-JFD](#)
Filer:
Document Number: [308](#)

Docket Text:
ORDER granting [274] Motion for Order to Show Cause. Signed by Magistrate Judge John F. Docherty on 7/18/2024. (ALM)

0:22-cv-00098-JMB-JFD Notice has been electronically mailed to:

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The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1051215216 [Date=7/18/2024] [FileNumber=9322447-0
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724d4784b7994246d482c082d637eb29c7e053c08dcef9772780c47fd3e3f]]

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